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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

PETER POLL,

Plaintiff,

vs.

RONALD A. MOTZKUS AND  
MONUMENT TITLE INSURANCE, INC.

Defendants

Case No.: 2:21-cv-01591-JCM-DJA

**As amended on page 3**

**STIPULATION AND ORDER**

Plaintiff PETER POLL (“Plaintiff”), by and through his attorney, Jay A. Shafer, Esq. of the law firm of Cory Reade Dows & Shafer and Defendants RONALD A. MOTZKUS and MONUMENT TITLE INSURANCE, INC. (collectively, “Defendants”) by and through their attorneys Aleem A. Dhalla, Esq. and Paul W. Shakespear, Esq. of the law firm of Snell & Wilmer hereby stipulate that:

- (1) Plaintiff desires to file an amended complaint addressing the facts and legal causes of action, and Defendants have been presented the proposed amended complaint and are reviewing the same, and agree that there should be no dismissal for failure to prosecute.

- (2) Defendants agree to either sign a stipulation allowing the amended complaint to be filed or to extend the time to file a motion to amend until March 22, 2023.
- (3) Defendants do not object to the continuance.
- (4) Plaintiff agrees to not request a default at this time and to extend the time for Defendants to file an Answer to within 21 days from the filing of an amended complaint, or 21 days after a motion to amend is denied.
- (5) This is the first request for a continuance in this case, and denial of this request for continuance would result in a miscarriage of justice and the ends of justice would best be served by a brief continuance to allow for an extension of time for Plaintiff to amend his complaint and Defendants to answer the same.

Dated this 10th day of March 2023.

Dated this 10<sup>th</sup> day of March 2023.

CORY READE DOWS & SHAFER

SNELL & WILMER, L.L.P.

By: /s/ Jay A. Shafer, Esq.  
Jay A. Shafer, Esq.  
Nevada Bar No. 9184  
1333 North Buffalo Drive, Suite 210  
Las Vegas, Nevada 89128  
Attorneys Plaintiff  
Peter Poll

By: /s/ Aleem A. Dhalla, Esq.  
Aleem A. Dhalla, Esq.  
Nevada Bar No. 14188  
Paul W. Shakespear, Esq.  
Nevada Bar No. 10752  
3883 Howard Hughes Parkway, Suite 1100  
Las Vegas, Nevada 89169  
Attorneys for Defendants  
Ronald A. Motzkus and  
Monument Title Insurance, Inc

**ORDER**

**UPON STIPULATION OF THESE PARTIES**, and therefore good cause appearing:

IT IS THEREFORE ORDERED that this matter shall not be dismissed for failure to prosecute at this time.

IT IS FURTHER ORDERED that Defendants shall have twenty (21) days to answer from the date of the filing of the amended complaint, or if a request to file an amended complaint is denied, shall file an answer to the operative complaint within twenty (21) days of the denial of such a request.

IT IS FURTHER ORDERED that, on or before **April 13, 2023**, either: (1) the parties shall file a stipulation for Plaintiff to amend the complaint; (2) Plaintiff shall file a motion to amend the complaint; or (3) the parties shall file a joint status report.

Dated: March 15, 2023.



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DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE